

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF TEXAS,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF LOUISIANA,  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

V.

Civil Action No. 2:21-CV-00022-Z

PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.,  
PLANNED PARENTHOOD GULF  
COAST, INC., PLANNED  
PARENTHOOD OF GREATER  
TEXAS, INC., PLANNED  
PLANNED PARENTHOOD SOUTH  
TEXAS, INC., PLANNED  
PARENTHOOD CAMERON  
COUNTY, INC., PLANNED  
PARENTHOOD SAN ANTONIO,  
INC.,

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF DEADLINE TO FILE  
EXPERT OBJECTIONS AND MOTION FOR EXPEDITED  
CONSIDERATION**

Plaintiffs respectfully move this Court for an extension of time to file expert objections until December 8, 2023. Plaintiffs also respectfully move for expedited consideration of this motion in light of the current deadline on Monday, November 20. In support thereof, Plaintiffs state as follows:

1. On October 23, 2023, the Court issued its ruling on the parties' summary judgment motions and issued a new scheduling order (Dkt. 555). Pursuant to that order, the parties filed their final expert designations on November 6, 2023. According to the scheduling order, the parties' deadline for filing expert objections is November 20, 2023.

2. Because of the press of other work and family commitments, undersigned counsel requests an extension of time for expert objections. The purpose of the extension is not for delay, but to allow counsel to provide helpful briefing to the Court.

3. Defendants designated six experts on November 6, 2023. Plaintiffs will be filing Daubert motions for all six, which will take significant time and effort. Relator's counsel is in trial this week in state court. Counsel for Texas has a responsive pleading due on November 20. Relator's counsel has a motion for class certification and a mediation statement due on November 21, a mediation reply due December 4, and will be out of state on vacation for the Thanksgiving holiday from November 18-24.

4. On November 9, 10, and 14, 2023, Plaintiffs' counsel conferred with Defendants' counsel regarding this motion. Defendants are unopposed to the

extension if the deadline for responses (which would normally fall on December 29 pursuant to the Local Rules) is extended to January 8 because of the Christmas and New Year's holidays.

### CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the parties' deadline to file expert objections be extended until December 8, 2023 and the deadline to file responses to these objections be extended to January 8, 2024. Plaintiffs also respectfully request expedited consideration of this motion giving the quickly approaching deadline.

Respectfully submitted.

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***Attorneys for State of Texas***

### **CERTIFICATE OF CONFERENCE**

On November 9, 10, and 14, 2023, counsel for Plaintiffs conferred with counsel for Defendants regarding the relief requested in this motion. Defendants are unopposed.

/s/ Heather Gebelin Hacker  
Heather Gebelin Hacker

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2023, I electronically filed the foregoing document through the Court's ECF system, which automatically notifies counsel of record for each party.

/s/ Heather Gebelin Hacker  
Heather Gebelin Hacker